

Hon. Richard A. Jones

**IN THE U.S. DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON  
SEATTLE COURTHOUSE**

**ELISABETH REHN,**

**Plaintiff,**

**v.**

**CITY OF SEATTLE, a lawful municipal  
corporation in the State of Washington;  
RILEY CAULFIELD; YOUNGHUN  
KIM; SETH WAGNER; JOHN DUUS;  
AND JASON DRUMMOND,**

**Defendants.**

**CASE NO. 2:23-CV-01609-RAJ**

**[PROPOSED] ORDER GRANTING  
PLAINTIFF'S MOTION FOR  
SANCTIONS FOR SPOILIATION OF  
EVIDENCE**

**March 11, 2025  
With Oral Argument**

**1. ORDER OF THE COURT**

COMES NOW the Plaintiff who hereby presents the Court with Plaintiff's Motion for Sanctions for Spoliation of Evidence, AND the Court having considered the pleadings filed herein.

THE COURT HEREBY ORDERS, ADJUDGES and DECREES that the Plaintiff's Motion for Sanctions for Spoliation of Evidence is HEREBY GRANTED and that the Court ORDERS that a mandatory inference instruction shall be given as a sanction for the City's spoliation which has occurred in this case.

IT IS SO ORDERED.

\_\_\_\_\_  
Date

\_\_\_\_\_  
Honorable Richard A. Jones

**PROPOSED ORDER GRANTING PLF'S  
PLF'S MOTION FOR SPOILIATION OF EVIDENCE - 1**

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Presented by:

JAY H. KRULEWITCH, ATTORNEY AT LAW

s/Jay H. Krulewitch

Jay H. Krulewitch, WSBA No. 17612

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via email on this 18th day of February, 2025 to:

Alexandra Nica  
Catherine E. Riedo  
Seattle City Attorney's Office  
701 Fifth Avenue, Suite 2050  
Seattle, WA 98104  
Phone: (206) 684-8200  
E-mail: Alexandra.Nica@seattle.gov  
E-mail: Catherine.Riedo@seattle.gov

I declare under penalty of perjury under the laws of the United States and the State of Washington that the foregoing is true and correct.

DATED this 18th day of February, 2025.

s/Jay H. Krulewitch  
Jay H. Krulewitch, Attorney at Law